INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Frank O'Bannon
Governor

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September 11, 2003

TO: Interested Parties / Applicant

RE: Eltek of Indiana, Inc. / 137-18027-00017

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision – Approval

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to 326 IAC 2, this approval was effective immediately upon submittal of the application.

If you wish to challenge this decision, IC 4-21.5-3-7 requires that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, ISTA Building, 150 W. Market Street, Suite 618, Indianapolis, IN 46204, **within eighteen (18) calendar days from the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER-AM.dot 8/11/03

September 11, 2003

Mr. Michael R. Feagins
Eltek of Indiana, Inc.
1863 Lammers Pike
Batesville, IN 47006

Dear Mr. Feagins:

Re: Exempt Construction and Operation Status,
137-18027-00017

The application from Eltek of Indiana, Inc., received on August 18, 2003, has been reviewed. Based on the data submitted and the provisions in 326 IAC 2-1.1-3, it has been determined that the following emission units, to be located at 1863 Lammers Pike, Batesville, Indiana, are classified as exempt from air pollution permit requirements:

(a) One (1) natural gas-fired heat cleaning/ pyrolytic oven, model HC-6196 with a maximum heat input capacity of 2.6 mmBtu/hr, with a maximum painted metal throughput of 100 pounds per hour, with an integral direct flame afterburner, which has a maximum heat input capacity of 1.533 mmBtu/hr, exhausting to Stack #7.

(b) Two (2) natural gas-fired heat cleaning/ pyrolytic ovens, each with a maximum heat input capacity of 0.7 mmBtu/hr, with a maximum painted metal throughput of 80 pounds per hour each. These ovens exhaust to internal afterburners, with a maximum heat input capacity of 1.4 mmBtu/hr each, exhausting to two stacks.

(c) One (1) natural gas-fired heat cleaning/pyrolytic oven, model HC-6196, for cleaning reclaimed coating line fixtures and parts with cured coatings, with a maximum heat input capacity of 2.8 mmBtu/hr, with an intergral direct flame afterburner with a maximum heat input capacity of 1.65 mmBtu/hr, exhausting to Stack # 8.

The following conditions shall be applicable:

(1) Pursuant to 326 IAC 5-1-2 (Opacity Limitations) except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of 15 minutes (60 readings) in a 6-hour period as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuos opacity monitor in a six (6) hour period.

(2) Pursuant to 326 IAC 4-2-2:

(a) The four (4) heat cleaning/pyrolytic ovens at this source shall comply with the following requirements:

(1) Consist of primary and secondary chambers or the equivalent.

(2) Be equipped with a primary burner unless burning only wood products.

(3) Comply with 326 IAC 5-1 and 326 IAC 2.

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).

(5) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1000 pounds of dry exhaust gas under standard conditions corrected to fifty percent (50 %) excess air for incinerators with a maximum solid waste capacity of less than two hundred (200) pounds per hour.

(6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) An incinerator is exempt from subsections (a)(5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(c) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:
  (A) Precodures for receiving, handling, and charging waste.
  (B) Procedures for incinerator startup and shutdown.
  (C) Procedures for responding to a malfunction.
  (D) Procedures for maintaining proper combustion air supply levels.
  (E) Procedures for operating the incinerator and associated air pollution control systems.
  (F) Procedures for handling ash.
  (G) A list of wastes that can be burned in the incinerator.
(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
(3) The operation and maintenance plan must be readily accessible to incinerator operators.
(4) The owner or operator of the incinerator shall notify the deoartment, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(d) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

(3) Any change or modification that may increase the potential VOC emissions of emission units to greater than twenty five (25) tons per year shall require prior approval of the Office of air Quality (OAQ).

This exemption is being re-issued to the source.

An application or notification shall be submitted in accordance with 326 IAC 2 to the Office of Air Quality (OAQ) if the source proposes to construct new emission units, modify existing emission units, or otherwise modify the source.

Sincerely,

Original signed by

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

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cc: File - Ripley County
Ripley County Health Department
Air Compliance – Patrick Burton
Permit Tracking
Technical Support and Modeling - Michele Boner
Compliance Data Section - Karen Nowak

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD) for an Exemption

Source Background and Description

Source Name:	**Eltek of Indiana, Inc.**
Source Location:	**1863 Lammers Pike, Batesville, IN 47006**
County:	**Ripley**
SIC Code:	**3449**
Exemption No.:	**137-18027-00017**
Permit Reviewer:	**Madhurima D. Moulik**

The Office of Air Quality (OAQ) has reviewed an application from Eltek of Indiana, Inc. relating to the construction and operation of one (1) new heat cleaning/pyrolytic oven. The source operation involves reclamation of coating line fixtures and parts with cured coating, which when cleaned up are returned to customers.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) One (1) natural gas-fired heat cleaning/ pyrolytic oven, model HC-6196 with a maximum heat input capacity of 2.6 mmBtu/hr, with a maximum painted metal throughput of 100 pounds per hour, with an integral direct flame afterburner, which has a maximum heat input capacity of 1.533 mmBtu/hr, exhausting to Stack #7.

(b) Two (2) natural gas-fired heat cleaning/ pyrolytic ovens, each with a maximum heat input capacity of 0.7 mmBtu/hr, with a maximum painted metal throughput of 80 pounds per hour each. These ovens exhaust to internal afterburners, with a maximum heat input capacity of 1.4 mmBtu/hr each, exhausting to two stacks.

New Emission Units and Pollution Control Equipment

The source also consists of the following unpermitted facilities/units:

(a) One (1) natural gas-fired heat cleaning/pyrolytic oven, model HC-6196, for cleaning reclaimed coating line fixtures and parts with cured coatings, with a maximum heat input capacity of 2.8 mmBtu/hr, with an intergral direct flame afterburner with a maximum heat input capacity of 1.65 mmBtu/hr, exhausting to Stack # 8.

Existing Approvals

The source has been operating under previous approvals including, but no limited to, the following:

(a) Exemption No.: 137-9480-00017, issued on March 4, 1998;

(b) Exemption No. 137-12893-00017, issued on January 4, 2001; and

(c) Exemption No. 137-15333-00017, issued on January 14, 2002.

Enforcement Issue

There are no enforcement actions pending.

Stack Summary

Stack ID	Operation	Height (ft)	Diameter (ft)	Flow Rate (acfm)	Temp (^{o}F)
--	Oven/afterburner	17	1.83	1555	1,600
--	Oven/afterburner	17	1.83	1555	1,600
7	Oven/afterburner (HC-6196)	25	1.66	2965	1,400
8	New oven/afterburner (HC-6196)	25	1.66	3,200	1,400

Recommendation

The staff recommends to the Commissioner that the construction and operation be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

A complete application for the purposes of this review was received on August 18, 2003.

Emission Calculations

See Appendix A of this document for detailed emission calculations for combustion sources and the three (3) existing heat cleaning/pyrolysis ovens.

For the new pyrolytic oven, emission factors have been provided by source based on tests conducted on similar ovens (adjusted for maximum processing rate).

Potential to Emit of:

SO2 = 0.031 lb/hr = 0.13 tons/yr
NOx = 0.307 lb/hr = 1.35 tons/yr
CO = 0.031 lb/hr = 0.13 tons/yr
VOC = 0.061 lb/hr = 0.27 tons/yr

Potential to Emit of Source Before Controls

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as “the maximum capacity of a stationary source or emissions unit to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, inclulding air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U.S. EPA, the department, or the appropriate local air pollution control agency.”

Pollutant	Potential to Emit (tons/yr)
PM	4.1
PM-10	4.4
SO_2	0.91
VOC	2.1
CO	10.4
NO_x	7.4

HAPs	Potential to Emit (tons/yr)
Single HAP	Negligible
Total	Negligible

(a) The potential to emit (as defined in 326 IAC 2-7-1(29)) of pollutants are less than the levels listed in 326 IAC 2-1.1-3(d)(1). Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

(b) The potential to emit (as defined in 326 IAC 2-7-1(29)) of any single HAP is less than ten (10) tons per year and/or the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination of HAPs is less than twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-1.1-3. An exemption will be issued.

County Attainment Status

The source is located in Ripley County.

Pollutant	Status
PM-10	attainment
SO_2	attainment
NO_2	attainment
Ozone	attainment
CO	attainment
Lead	attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. Ripley County has been designated as attainment or unclassifiable for ozone. Therefore, VOC emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

(b) Ripley County has been classified as attainment or unclassifiable for all other criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2. See the State Rule Applicability for the source section.

Part 70 Permit Determination

326 IAC 2-7 (Part 70 Permit Program)

This existing source, including the emissions from the new heat cleaning oven, is still not subject to the Part 70 Permit requirements because the potential to emit (PTE) of:

(a) each criteria pollutant is less than 100 tons per year,
(b) a single hazardous air pollutant (HAP) is less than 10 tons per year, and
(c) any combination of HAPs is less than 25 tons per year.

Federal Rule Applicability

(a) The heat cleaning/pyrolytic ovens at this facility are not subject to the requirements of the New Source Performance Standard, 326 IAC 12 (40 CFR 60.50, Subpart E). This rule applies to incinerators with charge rates exceeding 50 tons per day. Incinerators are defined as furnaces used for combusting solid waste for the purpose of reducing the volume of the waste. “Solid waste” is defined as refuse, more than 50 percent of which is municipal type waste consisting of a mixture of paper, wood, yard waste, food waste, plastics, leather, rubber and other combustible and non-combustible materials such as glass and

rock. By this definition, the material combusted in the pyrolytic ovens are not "solid waste", and therefore, this rule does not apply.

(b) The heat cleaning/pyrolytic ovens at this facility are not subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Hazardous Waste Combustors, 326 IAC 20, (40 CFR 63, Subpart EEE), because the ovens do not combust any hazardous waste.

(c) There are no other National Emission Standards for Hazardous Air Pollutants (NESHAP), 326 IAC 20, (40 CFR 63) applicable to this source.

State Rule Applicability – Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration)

The potential to emit of all pollutants from this source are less than 250 tons per year, and it is not one of the twenty-eight listed source categories. Therefore, 326 IAC 2-2 does not apply.

326 IAC 2-6 (Emission Reporting)

This source is located in Ripley County and the potential to emit of all pollutants are less than one hundred (100) tons per year. Therefore, 326 IAC 2-6 does not apply.

326 IAC 2-4.1 (Major Sources of Hazardous Air Pollutants (HAP))

The operation of the heat cleaning/pyrolytic ovens will emit less than 10 tons per year of a single HAP or 25 tons per year of a combination of HAPs. Therefore, 326 IAC 2-4.1 does not apply.

326 IAC 5-1 (Visible Emissions Limitations)

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Exemptions), opacity shall meet the following, unless otherwise stated in the permit:

(a) Opacity shall not exceed an average of forty percent (40%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings) as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability – Individual Facilities

326 IAC 6-3-2 (Process Operations)

Incineration and manufacturing processes with potential emissions below 0.551 lb/hr are exempt from the requirements of 326 IAC 6-3. 326 IAC 1-2-34 defines an incinerator as "an engineered apparatus that burns waste substances with controls on combustion factors, including, but not limited to, temperature, retention time, and air. "Waste substances" are not defined in state rules. The heat cleaning ovens meet the other criteria for exemption, therefore, 326 IAC 6-3-2 does not apply.

326 IAC 8-1-6 (VOC Rules: General Reduction Requirements)

All of the emission units at this source have potential VOC emissions of less than 25 tons per year. Therefore, 326 IAC 8-1-6 does not apply.

326 IAC 4-2-2 (Incinerators)

The pyrolytic ovens at this facility meet the definition of "incinerator" as defined in 326 IAC 1-2-34, and are not subject to 40 CFR 63, Subpart EEE. Therefore, pursuant to 326 IAC 4-2-1, the ovens are subject to the requirements of 326 IAC 4-2-2.

Pursuant to 326 IAC 4-2-2:

(a) The heat cleaning/pyrolytic ovens shall comply with the following requirements:

(1) Consist of primary and secondary chambers or the equivalent.

(2) Be equipped with a primary burner unless burning only wood products.

(3) Comply with 326 IAC 5-1 and 326 IAC 2.

(4) Be maintained, operated, and burn waste in accordance with the manufacturer's specifications or an operation and maintenance plan as specified in subsection (c).

(5) Not emit particulate matter in excess of five-tenths (0.5) pound of particulate matter per one thousand (1000 pounds of dry exhaust gas under standard conditions corrected to fifty percent (50 %) excess air for incinerators with a maximum solid waste capacity of less than two hundred (200) pounds per hour.

(6) If any of the requirements of subdivisions (1) through (5) are not met, then the owner or operator shall stop charging the incinerator until adjustments are made that address the underlying cause of the deviation.

(b) An incinerator is exempt from subsections (a)(5) if subject to a more stringent particulate matter emission limit in 40 CFR 52 Subpart P, State Implementation Plan for Indiana.

(c) An owner or operator developing an operation and maintenance plan pursuant to subsection (a)(4) must comply with the following:

(1) The operation and maintenance plan must be designed to meet the particulate matter emission limitation specified in subsection (a)(5) and include the following:
(A) Precodures for receiving, handling, and charging waste.
(B) Procedures for incinerator startup and shutdown.
(C) Procedures for responding to a malfunction.
(D) Procedures for maintaining proper combustion air supply levels.
(E) Procedures for operating the incinerator and associated air pollution control systems.
(F) Procedures for handling ash.
(G) A list of wastes that can be burned in the incinerator.
(2) Each incinerator operator shall review the plan before initial implementation of the operation and maintenance plan and annually thereafter.
(3) The operation and maintenance plan must be readily accessible to incinerator operators.
(4) The owner or operator of the incinerator shall notify the deoartment, in writing, thirty (30) days after the operation and maintenance plan is initially developed pursuant to this section.

(d) The owner or operator of the incinerator must make the manufacturer's specifications or the operation and maintenance plan available to the department upon request.

Conclusion

The construction and operation of the heat cleaning/pyrolytic ovens for the reclamation of metal parts shall be subject to the conditions of the Exemption No.: 137-18027-00017.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Furnaces

Company Name: **Eltek of Indiana, Inc.**
Address City IN Zip: **1863 Lammers Pike, Batesville, IN 47006**
Permit Number: **137-18027**
Plt ID: **137-00017**
Reviewer: **Madhurima D. Moulik**
Date: **21-Aug-03**

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
12.8	112.1

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.9	7.6	0.6	100.0 **see below	5.5	84.0
Potential Emission in tons/yr	0.1	0.4	0.0	5.6	0.3	4.7

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 32

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMB
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-00
(SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/ton

See page 2 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
HAP Emissions
Furnaces

Company Name: Eltek of Indiana, Inc.
Address City IN Zip: 1863 Lammers Pike, Batesville, IN 47006
Permit Number: 137-18027
Plt ID: 137-00017
Reviewer: Madhurima D. Moulik
Date: 21-Aug-03

	HAPs - Organics				
	Benzene	Dichlorobenze	Formaldehyde	Hexane	Toluene
Emission Factor in lb/MMcf	2.1E-03	1.2E-03	7.5E-02	1.8E+00	3.4E-03
Potential Emission in tons/yr	1.177E-04	6.728E-05	4.205E-03	1.009E-01	1.906E-04

	HAPs - Metals				
	Lead	Cadmium	Chromium	Manganese	Nickel
Emission Factor in lb/MMcf	5.0E-04	1.1E-03	1.4E-03	3.8E-04	2.1E-03
Potential Emission in tons/yr	2.803E-05	6.167E-05	7.849E-05	2.130E-05	1.177E-04

Methodology is the same as page 1.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emission Calculations
Incinerator

Company Name: Eltek of Indiana, Inc.
Address City IN Zip: 1863 Lammens Pike, Batesville, Indiana 47006
Exemption No.: 137-18027
Plt ID: 137-00017
Reviewer: Madhurima D. Moulik
Date: 21-Aug-03

2 heat clean/pyrolytic ovens
@ 80 lb/hr throughput

THROUGHPUT lbs/hr
160

THROUGHPUT ton/yr
700.8

	POLLUTANT				
	PM/PM10	SO2	CO	VOC	NOX
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	2.5	0.9	3.5	1.1	1.1

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)

Appendix A: Emission Calculations
Incinerator

Company Name: Eltek of Indiana, Inc.
Address City IN Zip: 1863 Lammens Pike, Batesville, Indiana 47006
Exemption No.: 137-18027
Plt ID: 137-00017
Reviewer: Madhurima D. Moulik
Date Application Received: 21-Aug-03

THROUGHPUT lbs/hr	THROUGHPUT ton/yr
100	438

Heat Clean/Pyrolytic Oven

	POLLUTANT				
	PM/PM10	SO2	CO	VOC	NOX
Emission Factor in lb/ton	7.0	2.5	10.0	3.0	3.0
Potential Emissions in ton/yr	1.5	0.5	2.2	0.7	0.7

Methodology

Emission factors are from AP 42 (5th Edition 1/95) Table 2.1-12, Uncontrolled emission factors for industrial/commercial refuse combustors, multiple chambers
Throughput (lb/hr) * 8760 hr/yr * ton/2000 lb = throughput (ton/yr)